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BY: Patrick Papalia, Esq.
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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

MALIBU MEDIA, LLC,

Plaintiff,

v.

JOHN DOE subscriber assigned IP address
24.0.207.93,

Defendant.

Case No. 2:17-cv-01239-MCA-LDW

**DEFENDANT'S NOTICE OF MOTION
FOR LEAVE TO FILE ANSWER AND
PROCEED ANONYMOUSLY ON
CONSENT OF PLAINTIFF**

To: Patrick J. Cerillo, Esquire
Patrick J. Cerillo, LLC
4 Walter E. Foran Blvd., Suite 402
Flemington, NJ 08822
Attorneys for Plaintiff

Notice is given that on June 19, 2017, in Courtroom MLK 2A, Martin Luther King Building and U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, before the Honorable Madeline Cox Arleo, D.J., at 9:30 a.m. of that day, or as soon thereafter as counsel can be heard, Defendant, John Doe subscriber assigned IP address 24.0.207.93 ("Defendant"), will move the Court for an order granting him leave to file an answer and proceed anonymously

through the completion of discovery, on consent of the Plaintiff Malibu Media, LLC (“Plaintiff”).

Pursuant to Fed. R. Civ. P. 26(d)(1), and upon the attached: (1) Declaration of Patrick Papalia, (2) Declaration of John Doe, and (3) Legal Brief in support of this Motion, Defendant respectfully moves for entry of an order granting him leave to file an Answer and proceed anonymously through the completion of discovery, with the consent of Plaintiff.

A proposed form of Order is attached for the Court’s convenience.

ARCHER & GREINER, P.C.
Attorneys for Defendant John Doe
subscriber assigned IP address 24.0.207.93

By: /s/ Patrick Papalia
Patrick Papalia, Esq.

Dated: May 23, 2017